

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS

C.A. No. 04-12244-GAO
Consolidated

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|----------------------------------|---|
| STANDARD FIRE INSURANCE COMPANY, |) |
| Plaintiff |) |
| |) |
| v. |) |
| |) |
| CROSBY YACHT YARD, INC and |) |
| OYSTER HARBORS MARINE , INC., |) |
| Defendants |) |

JOINT MOTION FOR AN EXTENSION OF THE SCHEDULING ORDER

NOW COME all parties to the consolidated action and move the court for a two-month extension of the scheduling order deadlines in this case. The grounds for this motion are as follows:

1. This case involves extensive fire damage to the Plaintiffs' property caused by a fire at the defendant's premises.
2. The factual discovery deadline in this case expires on October 7, 2006.
3. The Plaintiffs and Defendants have been working together to coordinate schedules and have conducted four factual depositions to date. One more deposition is scheduled before the discovery deadline expires. Due to scheduling conflicts of parties and witnesses, two depositions need to be scheduled post-deadline.
4. The additional time will enable counsel to obtain depositions of witnesses identified in the discovery materials and automatic disclosures obtained to date.
5. There has been no pretrial conference scheduled in this case; however a status conference is scheduled for January 10, 2007.

The parties suggest the following deadlines:

December 7, 2006 for factual discovery;

February 28, 2007 for discovery; and

March 10, 2007 for the Status Conference.

WHEREFORE, all parties respectfully request, that the scheduling order deadlines in this case be extended for two months.

Respectfully submitted,
For the Plaintiff,

ACE American Insurance Co. et.al.,
By their attorney,
/s/ Paul F. Cavanaugh _____
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Oyster Harbor Marine Business
Trust, et. al.
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By its attorney,
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By its attorney,
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Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified in the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on September 20, 2006.